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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Application of GTE Corporation, Transferor and) CC Docket No. 98-184
Bell Atlantic Corporation, Transferee, for Consent)
to Transfer of Control)

MOTION FOR EXTENSION OF TIME

On October 8, 1998, the Federal Communications Commission (FCC or Commission) released a Public Notice¹ regarding the above-captioned proceeding. In its Public Notice, the Commission established November 23, 1998, as the deadline for filing comments and petitions to deny and December 23, 1998, as the deadline for filing oppositions or responses to the comments and petitions to deny.²

Pursuant to Section 1.46 of the Commission's Rules, 47 C.F.R. § 1.46, the Delaware Division of the Public Advocate,³ the Hawaii Attorney General,⁴ the Indiana

¹ Public Notice, GTE Corporation and Bell Atlantic Corporation Seek FCC Consent for a Proposed Transfer of Control and Commission Seeks Comment on Proposed Protective Order Filed By GTE and Bell Atlantic, DA 98-2035 (October 8, 1998).

² *Id.* at 2.

³ Pursuant to 29 Delaware Code, 8828 (3), the Public Advocate shall have the power "to appear on behalf of the interest of consumers in . . . the federal courts and federal administrative and regulatory agencies and commissions in matters involving rates, service and practices of public utilities." Because Bell Atlantic provides local exchange service in Delaware, the Public Advocate has an interest in this proceeding.

⁴ The Hawaii Attorney General is an agency of the State of Hawaii and is authorized to "[r]epresent the interests of consumers of utility services before any state or federal agency or instrumentality having jurisdiction over matters which affect those interests." Haw. Rev. Stat. § 269-54(b)(7). Because GTE is the primary provider of local exchange service for Hawaii, the Attorney General has an interest in this proceeding.

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List A B C D E

Office of Utility Consumer Counselor,⁵ the Iowa Office of Consumer Advocate,⁶ the Maryland People's Counsel,⁷ the New Jersey Ratepayer Advocate,⁸ the Ohio Consumers' Counsel (OCC),⁹ the Citizens Utility Board of Oregon,¹⁰ the Texas Office of the Public Utility Counsel,¹¹ The Utility Reform Network,¹² the Michigan Consumer Federation

⁵ The Indiana Office of Utility Consumer Counselor (OUCC) is an agency of the State of Indiana duly authorized to represent Indiana ratepayers in state and federal proceedings, including proceedings before the FCC. Indiana Code Sec. 8-1-1.1-9.1. GTE is one of the largest telephone companies in terms of access lines in Indiana, and therefore Indiana's ratepayers, and the OUCC, have an interest in this proceeding.

⁶ The Iowa Office of Consumer Advocate is a division of the Iowa Department of Justice authorized and directed by Chapter 475A and section 475A.2 of the Iowa Code to represent Iowa consumers with regard to utilities issues including those relating to telecommunications. GTE is a major provider of telecommunications services throughout Iowa and therefore the Iowa Office of Consumer Advocate has an important interest in this proceeding.

⁷ Pursuant to Section 2-205(b) of the Maryland Public Utility Companies Article (1998), "the Office of People's Counsel may appear before any federal or State unit to protect the interest of residential and noncommercial users." Bell Atlantic is the parent corporation of Bell Atlantic-Maryland, Inc. (BA-MD) and GTE is the parent corporation of GTE Communications Corporation (GTECC) and GTE Telecommunications Service, Inc. (GTE-TSI). BA-MD, GTECC, and GTE-TSI are certificated to provide telecommunications services in Maryland. The People's Counsel has an interest in this proceeding.

⁸ The Ratepayer Advocate is a newly created agency pursuant to the New Jersey Reorganization Plan No. 001-1994. The Ratepayer Advocate's role, to protect and advance the interest of residential ratepayers in New Jersey, has been broadened to include representation of all classes of ratepayers – residential, commercial, industrial, and small business – and to be more involved in the policy and planning of laws and regulations which impact all New Jersey ratepayers. The Ratepayer Advocate's new mandate in the area of policy and planning of energy and telecommunications is designed to afford the consumer a stronger voice in long range utility planning for the state. Bell Atlantic-New Jersey is currently the predominant monopoly incumbent local exchange carrier in New Jersey, and therefore the Ratepayer Advocate has an interest in this proceeding.

⁹ The OCC is the statutory representative of Ohio's residential consumers in matters involving Ohio's public utilities. See O.R.C. Chapter 4911. Because GTE is one of the largest telephone company in terms of access lines in the state, Ohio's residential consumers, and therefore the OCC, have an important interest in this proceeding.

¹⁰ The Citizens Utility Board of Oregon (CUB) is established as an independent nonprofit public corporation under Oregon Law "to represent the interests of utility consumers before legislative, administrative and judicial bodies." ORS 774.030. Because GTE is the second largest telephone utility in Oregon, CUB has an interest in this proceeding.

¹¹ The Texas Office of the Public Utility Counsel (OPC) is a governmental agency of the State of Texas which has been designated by law to represent residential and small commercial utility consumers of the state. OPC is responsible for representing those interests before Texas and federal regulatory agencies, as well as the courts. Because GTE is a major provider of local exchange service in Texas, the OPC has an interest in this proceeding.

¹² The Utility Reform Network (TURN) is a non-profit consumer advocacy organization which represents the interests of California's residential and small business customers of telecommunications utilities. Because GTE provides local exchange service in California, TURN has an interest in this proceeding.

(MCF),¹³ and the Edgemont Neighborhood Coalition¹⁴ (collectively hereinafter referred to as “Consumer Groups”) hereby move for a 60-day extension of time for filing pleadings in this proceeding. The requested extension of time would enable interested parties to provide more thorough and deliberate input into the record of this proceeding. This in turn will assist the Commission in its consideration of the weighty policy issues presented by this merger. In addition, the extension would allow the affected states much-needed time to prepare the competitive analysis noted by the Commission in its Bell Atlantic-NYNEX merger decision.¹⁵ Moreover, the additional time would allow a greater opportunity for consumer organizations from the 39 affected states to file a consolidated set of comments, rather than individual comments from each group, thus reducing the volume of pleadings the Commission must handle.

The public interest necessitates that the Commission allow adequate time to compile the record in this proceeding. The proposed merger would directly affect consumers in at least 39 states and the District of Columbia.¹⁶ It involves two of the largest companies in the *world* – companies that control more than 63 million local

¹³ MCF is a coalition of organizations representing over 400,000 Michigan residents, many of whom are customers of GTE. It was founded in 1991 to advocate for the interests of Michigan consumers in the shaping of public policy on issues before the Michigan Legislature, state executive branch agencies, the United States Congress, and federal regulatory bodies.

¹⁴ The Edgemont Neighborhood Coalition (Edgemont) is a nonprofit corporation based in a low income, African American neighborhood in Dayton, Ohio, which works to expand economic and educational opportunities and improve the quality of life for its members and all residents of the neighborhood. Because GTE is a major local exchange provider for the Dayton area, Edgemont has an interest in this proceeding.

¹⁵ See *In the Application of NYNEX Corporation and Bell Atlantic Corporation for Consent to Transfer of Control of NYNEX Corporation and Its Subsidiaries*, File No. NSD-L-96-10, Memorandum Opinion and Order, August 14, 1997, ¶ 26, n.45.

¹⁶ Bell Atlantic provides local exchange service in 13 states and the District of Columbia, while GTE provides local exchange service in 28 states (see Application at 3), including two states – Pennsylvania and Virginia – served by Bell Atlantic. See Application, Exhibit 1.

exchange access lines.¹⁷ These companies have the ability to advance – or inhibit – the competitive vision of the 1996 Telecommunications Act.

In this proceeding, the Consumer Groups intend to offer a thorough analysis of the proposed merger. However, this analysis is not expected to be completed until mid to late December. Therefore, the Consumer Groups seek an extension of the deadline to file comments and petitions to deny until January 25, 1999. Responses and objections would be due February 25, 1999. This short extension of the deadlines would not adversely affect the applicants, because they also face approval proceedings in several states¹⁸ and had not anticipated completion of the approval process until July of next year.¹⁹

The Commission is well aware of the magnitude of consolidation within the telecommunications industry. For example, Chairman Kennard has expressed the need for the Commission “‘to take a hard look at all of these transactions to see if they can fit within the pro-competitive thrust’ of the 1996 Telecommunications Act.”²⁰ Moreover, Commissioner Ness has noted that the FCC’s role in telecommunications mergers “has never been more important, given the historic changes that are now underway in this vital sector of the American economy.”²¹ The record in this proceeding, therefore, should be

¹⁷ See “Bell Atlantic, GTE seek to join merger parade,” *Cleveland Plain Dealer*, July 29, 1998, at 1-C, 4-C.

¹⁸ See “Illinois Hearings Foreshadow Issues as 32 States and FCC Prepare to Review Bell Atlantic-GTE Merger,” *State Telephone Regulation Report*, October 16, 1998, at 6-7.

¹⁹ See “Bell Atlantic and GTE Agree to Merge,” GTE Press Release [<http://www.gte.com/g/news/gtebell.html> (visited October 20, 1998)].

²⁰ “Ameritech and SBC haven’t shown benefits of merger, F[C]C chief says,” *Cleveland Plain Dealer*, July 31, 1998, at 1-C.

²¹ Statement of Commissioner Susan Ness, Federal Communications Commission, on Mergers and Consolidation in the Telecommunications Industry before the Committee on the Judiciary, U.S. House of Representatives, June 24, 1998 [<http://www.fcc.gov/Speeches/Ness/States/stsn820.html> (visited Aug. 4, 1998)]

as complete as possible to allow the Commission to make an informed, reasoned decision. The Consumer Groups urge the Commission to grant the requested extension of time.

Respectfully submitted,


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Counsel for Edgemont Neighborhood
Coalition


October 30, 1998

CERTIFICATE OF SERVICE

I hereby certify that a copy of this Motion for Extension of Time was served by first-class mail, postage prepaid, to the parties identified below, on this 30th day of October, 1998.

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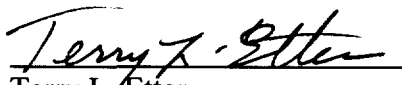
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I hereby certify that a copy of this Motion for Extension of Time was served by first-class mail, postage prepaid, to the parties identified below, on this 30th day of October, 1998.

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